

Todd M. Friedman, Esq. (216752)
Law Offices of Todd M. Friedman, P.C.
324 S. Beverly Dr., #725
Beverly Hills, CA 90212
Phone: (877) 206-4741
Fax: (866) 633-0228
tfriedman@AttorneysForConsumers.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SONIA BARRIENTOS , Individually,)	Case No. 2:16-cv-02473-R-JEM
And On Behalf Of All Others Similarly)	
Situated,)	JOINT STIPULATION OF
	DISMISSAL OF ACTION WITH
Plaintiff,)	PREJUDICE AS TO THE NAMED
v.)	PLAINTIFF AND WITHOUT
	PREJUDICE AS TO THE
ASHTON & WEINBERG INC., et al ,)	PUTATIVE CLASS
)
Defendant.)	
)

NOW COME THE PARTIES by and through their attorneys to respectfully move this Honorable Court to dismiss this matter with prejudice as to the named Plaintiff, and without prejudice as to the Putative Class alleged in the complaint, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Each party shall bear their own costs and attorney fees. A proposed order has been concurrently submitted to this Court.

The notice and approval requirements of Federal Rule of Civil Procedure 23(e) are inapplicable to the parties' settlement and dismissal of this putative class action because this action has not been certified as a class.¹

¹ Federal Rule of Civil Procedure 23(e) states "[t]he claims, issues or defenses of a certified class may be settled, voluntarily dismissed, or compromised only with the Court's approval.

1 The Parties agree that this Court can proceed to dismiss this Action entirely
2 with prejudice as to the Named Plaintiff and without prejudice as to the Putative
3 Class alleged in the complaint.

4
5 Respectfully submitted this 18th day of August, 2016

6 By: s/Todd M. Friedman, Esq.
7 TODD M. FRIEDMAN
8 Attorney for Plaintiffs

9
10 By: s/ Gregory K Lee, Esq.
11 GREGORY K. LEE
12 Attorneys for Defendant

1 Filed electronically on this 18th day of August, 2016, with:

2 United States District Court CM/ECF system

3 Notification sent electronically via the Court's ECF system to:

4
5 Honorable Manuel L. Real
6 United States District Court
7 Central District of California

8 David S Eisen
9 Wilson Elser Moskowitz Edelman and Dicker LLP

10 Gregory K Lee
11 Wilson Elser Moskowitz Edelman and Dicker LLP

12
13 This 18th day of August, 2016

14 s/Todd M. Friedman, Esq.
15 TODD M. FRIEDMAN